

Dennis J. Cook
4127 Ivanhoe Avenue
Norwood, Ohio 45212

- 1/4/01 **Dennis Cook.** Copy of 12/31/00 letter to Dennis Cook from Thomas Condit and with record of proceedings dated 12/22/00 for Industrial Commission of Ohio. .25 hrs.
- 1/10/01 **Dennis Cook.** Notice of Hearing from Industrial Commission with hearing set for 1/26/01 at 10 a.m. .25 hrs.
- 3/16/01 **Dennis Cook.** Invoice from Dr. Parsons for \$120.00. .25 hrs.
- 3/27/01 **Dennis Cook (Industrial Commission case).** Letter from Thomas Condit. .25 hrs.
- 4/30/01 **Cook vs. Norwood.** Invoice from Dr. Parsons for \$120.00. N/C.
- 6/1/01 **Dennis Cook.** Invoice from Dr. Parsons for \$120.00. N/C.
- 6/15/01 **Cook.** Fax from Dr. Parsons' office with statement for Cook. N/C.
- 6/16/01 Letter to Parsons with payment for his most recent statement for services concerning evaluation of Dennis Cook; paid \$125.00 .25 hrs. \$125.00.
- 6/28/01 Meeting with Cook reference injuries to his son concerning him being sprayed with mace or some chemical irritant; Cook is upset with the situation as Perkins recently had his dog poisoned and it was verified by an autopsy and Cook believes the City, Cross and Hubbard are coming after his children as the result of Perkins winning his case before Judge Dlott; told him I will request the records from the Norwood Fire Dept. and he needs to keep an eye on his children since five dogs were killed and his cat was stabbed since the filing of the EEOC complaints; be careful and be watchful of his surroundings and if anything occurs to call the police. 2.50 hrs.
- 7/8/01 Letter to Norwood Fire Department concerning treatment provided to Christian Cook concerning incident on June 28, 2001; prepared a medical release for Cook to sign; told Cook the letter was sent and to take care of his son and the issue will be addressed when EEOC ever makes a final decision to give him a right to sue letter; Cook wanted to know what is taking EEOC so long and I told him I have no idea as I wrote letters to get it to issue a right to sue letter and I still don't have any information. Prepared and sent a letter to Chief Schlie concerning injuries to Christian

Cook and detailed the other actions occurring to other witnesses who testified in federal court at Cook's request to hopefully put an end to the reprisals and I explained to Cook the City of Norwood did nothing after my windows were broken four times after Norwood lost cases before SERB and there is no reason to expect different treatment at the present time by Norwood. Discussed with Cook the issue of his PERS medical records and he will need them for his case and told him I will send a letter today to obtain copies of the medical records and sent the letter to PERS to obtain all medical records in his file and prepared a second letter from Cook to obtain information concerning PERS history and benefit history and requirements for retirement. Letters sent to Good Samaritan Hospital to medical records and medical billing requesting copies of medical records and billings for Cook 6.25 hrs.

- 7/10/01 Hochbein fires Hubbard as the result of "cleaning house" based on Hubbard's testimony in federal court in Perkins case; discussed with Cook and advised that Hochbein is attempting to insulate himself and he is not trustworthy to do what is right unless he perceives himself in personal jeopardy. 1.50 hrs.
- 7/13/01 **Cook vs. Norwood (A-0101644).** Letter from Thomas Condit reference workers' comp case and Norwood is fighting the claim. .25 hrs.
- 7/17/01 Letter to Hall reference expenses for mediation on Cook's cases as recommended by Judge Dlott and to clarify how expenses of the mediator will be shared by the parties; advised Hall the Municipal League was to pay the mediator based on the representations before Judge Dlott and wanted him to confirm the payment of expenses. .50 hrs.
- 7/18/01 **Dennis Cook.** Medical records received from Group Health Associates. .75 hrs.
- 7/20/01 **Dennis Cook.** Medical records received from Good Samaritan Hospital. .50 hrs.
- 7/24/01 **Dennis Cook.** Copy of 7/19/01 letter to Dennis Cook from PERS; meet with Cook. .25 hrs..
- 7/25/01 **Dennis Cook.** Letter from PERS with copies of medical reports for client. .25 hrs.
- 7/26/01 **Dennis Cook.** Statement from Smart Corporation for \$69.43.
- 7/31/01 Meeting with Cook reference settlement of his claims against the City of

Norwood and all connected with the City of Norwood; Cook is adamant concerning his demand and after discussion at length I was unable to adjust his position concerning the final settlement demand and Erwin was unable to convince him to modify it; letter to Hall reference settlement of all of Cook's claims against the City of Norwood and individual defendants; prepared and sent at the request of Hall. 3.75 hrs.

- 8/12/01 Meeting with Cook concerning his EEOC claim and advised him that EEOC has not contacted me and I forwarded all information it requested immediately upon receipt of a phone call or any request for information; told Cook the agency in charge of EEOC will probably be the Attorney General since the U.S. Attorney can bring an action on behalf of an individual when EEOC finds probable cause; a letter should be sent to the US Attorney General and explain the dissatisfaction with EEOC sitting on his case and not making a decision to proceed or issue a right to sue letter; prepared a letter for Cook to send to John Ashcroft and sent it via certified mail in the hope of getting someone at EEOC to issue a right to sue letter; the entire process of dealing with EEOC is a joke and explained same to Cook. 2.75 hrs.
- 8/6/01 **Cook vs. Norwood.** Letter from Thomas Condit. .25 hrs.
- 8/10/01 **Dennis Cook.** Medical records from Good Sam Hospital. .25 hrs.
- 8/14/01 **Dennis Cook vs. Norwood, et al.** Letter from Gary Hall with Motion of Counsel for Norwood to withdraw from representation and to continue case management dates; Hall has seen the light but there will be new attorneys to pick up the case and litigate. .25 hrs.
- 9/10/01 **Cook vs. Norwood.** Letter from Marjorie Corman Aaron with attached mediation agreement. .25 hrs.
- 9/11/01 Research on issues of discrimination on the net and read and review MERITOR SAVINGS BANK, FSB v. MECHELLE VINSON et al., 477 US 57, 91 L Ed 2d 49, 106 S Ct 2399, concerning issues of hostile work environment and issue of a party may establish a violation of Title VII of the Civil Rights Act of 1964 (42 USCS §§ 2000e--2000e-17) by proving that discrimination based on sex has created a hostile or abusive work environment; a claim for sexual harassment may lie in the absence of any economic effect on the plaintiff's employment; if it is good enough for one type of discrimination it should be good enough for any type of discrimination. 3.25 hrs.
- 9/17/01 **Cook vs. Norwood.** Letter from Marjorie Aaron with invoice for \$7000.00

and revised Mediation agreement. .25 hrs.

- 10/5/01 **Cook vs. Norwood.** Fax from Patia Tabar with relevant provisions of City of Norwood Insurance Policy with full copy of policy to be mailed next week. .75 hrs.
- 10/11/01 **Dennis Cook.** Fax from Peggy Ross of Bethesda Oak Hospital with copies of Dennis Cook's medications. .25 hrs.
- 10/12/01 **Cook vs. Norwood.** Letter from Patia Tabar with copy of city's insurance policies for 1998 and 1999; review documents. 1.75
- 10/16/01 **Cook vs. Norwood.** Letter from Larry Barbieri with Memorandum of Law requested by mediator. .50 hrs.
- 10/16/01 Letter to Hall enclosing medical bill of Cook from August 2001 per request of Hall. Legal research on 2744 R.C., Sawicki v. Ottawa Hills, 37 OS3d 222, 525 NE2d 468, Burr v. Stark Cty. Bd. of Commrs., 23 OS3d 69, 23 OBR 200, 491 NE2d 1101, Ellithorp v. Barberton City Sch. Dist. Bd. of Edn., No. 18029 (9th Dist.), 1997 Ohio App. LEXIS 3053, Brkic v. Cleveland, 124 OApp3d 271, 706 NE2d 10, Roe v. Hamilton Cty. Dept. of Human Serv., 53 OApp3d 120, 560 NE2d 238, Singer v. Fairborn, 73 OApp3d 809, 598 NE2d 806, Potter v. Troy, 78 OApp3d 372, 604 NE2d 828, Nungester v. Cincinnati, 100 OApp3d 561, 654 NE2d 423, E.J. v. Hamilton County, Ohio, 707 FSupp 314 (S.D.), Sargi v. Kent City Bd. of Educ., 70 F3d 907 (6th Cir.), § 2744.09 Actions and claims exempted from provisions, RC § 2744.03 in preparation for mediation hearing recommended by Judge Dlott. 7.75 hrs.
- 10/31/01 Letter to EEOC attention of Larry Watson requesting the right to sue letter, no settlement has occurred and two other individuals who filed EEOC complaints were issued right to sue letters .50 hrs.
- 11/5/01 **Dennis Cook.** Copy of 11/1/01 letter from Thomas Condit to Dennis Cook ref. Mr. Condit no longer representing Cook and RGK new attorney. .25 hrs.
- 11/7/01 **Dennis Cook.** Received signed certified mail return receipt card back from EEOC reference wanting right to sue letter. .25 hrs.
- 11/15/01 **Cook vs. Norwood.** Letter from Marjorie Aaron with her invoice for \$5,625.00. .25 hrs.
- 11/16/01 **Cook vs. BWC.** Letter from Thomas Condit ref. Report date of 12/17/01

at 9 a.m. .25 hrs.

- 11/16/01 **Dennis Cook.** Right to Sue letter from EEOC dropped off by Cook; EEOC settled the case without involvement of Cook with Norwood and Cook was never contacted reference settlement negotiations or that settlement was under way at any time; explained to Cook EEOC dropped the ball on the case and he is required to be involved in the settlement negotiations and Norwood knows it and Norwood simply attempted to do an end run and not involve him; explains why we had to contact people in Cleveland and the attorney general on his case; EEOC is supposed to know what is going on and they simply screwed him by leaving him out of the process; the entire matter is a joke with EEOC waiting over three years to issue a right to sue letter. 3.25 hrs.
- 11/30/01 **Dennis Cook vs. BWC.** Letter from Thomas Condit ref. Meeting with Bob before 12/17/01, the date case is set for report. .25 hrs.
- 12/14/01 **Cook vs. Norwood.** Letter from Michael Maundrell. .25 hrs.
- 12/19/01 **Cook vs. Norwood.** Letter from Michael Maundrell. .25 hrs.
- 12/19/01 **Cook v. Norwood.** Fax from Gary Hall; probably the luckiest guy in town since he is not required to represent Norwood; at least left with some level of integrity. .25 hrs.
- 12/20/01 **Dennis Cook vs. James Conrad.** Notice from assign. Comm. Of case set for report and trial setting on 1/22/02 at 9 a.m.

Total Hours: 41.75

Hourly Rate: \$225.00

Copies: \$.00

Expenses: \$194.43

Charges: \$9,393.75

TOTAL AMOUNT DUE: \$9,588.18